

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\*\*\*

US BANK NATIONAL ASSOCIATION, AS )  
TRUSTEE FOR THE SPECIALTY )  
UNDERWRITING AND RESIDENTIAL )  
FINANCE TRUST AND MORTGAGE LOAN )  
ASSET-BACKED CERTIFICATES SERIES )  
2006-BC4, )

Case No. 3:16-cv-00501-RCJ-CSD

Plaintiff, )

vs. )

WOODLAND VILLAGE; WESTLAND REAL )  
ESTATE DEVELOPMENT AND )  
INVESTMENTS; THUNDER PROPERTIES, )  
INC.; AND PHIL FRINK & ASSOCIATES, )  
INC., )

**ORDER GRANTING**

Defendants. )  
\_\_\_\_\_ )

**STIPULATION TO EXTEND DISPOSITIVE MOTION DEADLINE**  
**(Fourth Request)**

COMES NOW, Defendant, THUNDER PROPERTIES, INC., and Plaintiff, US BANK  
NATIONAL ASSOCIATION, AS TRUSTEE FOR THE SPECIALTY UNDERWRITING AND  
RESIDENTIAL FINANCE TRUST AND MORTGAGE LOAN ASSET-BACKED

1 CERTIFICATES SERIES 2006-BC4, by and through their undersigned counsel, and hereby  
2 stipulate and agree as follows:

- 3 1. Pursuant to this Court's Order dated November 3, 2022 [ECF #65], the parties  
4 hereto are to file Motions for Summary Judgment on or before December 7, 2022.
- 5 2. The parties continue to discuss settlement and prefer to devote their time and  
6 resources to an effort to amicably resolve the instant matter prior to engaging in  
7 further litigation. US Bank continues to consider a settlement offer from  
8 Defendant and is working on formulating a response. The Thanksgiving Day  
9 holiday and associated family obligations are believed to have slowed this  
10 process. The parties do not currently expect to be able to fully explore settlement  
11 in advance of December 7, 2022.
- 12 3. The Christmas and New Years Day holidays are rapidly approaching and these  
13 holiday seasons will likely further slow the parties' negotiations.
- 14 4. Based upon the foregoing, the parties respectfully request that the deadline to file  
15 Motions for Summary Judgment herein be extended for an additional  
16 approximately 60 days until February 7, 2023.

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

5. This Stipulation is made in good faith and not for purpose of delay.

Dated this 29<sup>th</sup> day of November, 2022.

ROGER P. CROTEAU &  
ASSOCIATES, LTD.

AKERMAN, LLP

/s/ Timothy E. Rhoda  
TIMOTHY E. RHODA, ESQ.  
Nevada Bar No. 7878  
2810 W. Charleston Blvd., #67  
Las Vegas, Nevada 89102  
(702) 254-7775  
[croteaulaw@croteaulaw.com](mailto:croteaulaw@croteaulaw.com)  
*Attorney for Defendant*  
*Thunder Properties, Inc.*

/s/ Melanie D. Morgan  
MELANIE D. MORGAN, ESQ.  
Nevada Bar No. 8215  
LILITH V. XARA, ESQ.  
Nevada Bar No. 1318  
1635 Village Center Circle, Suite 200  
Las Vegas, NV 89134  
(702) 634-5000  
[lilith.xara@akerman.com](mailto:lilith.xara@akerman.com)  
*Attorney for Plaintiff*  
*U.S. Bank National Association*

IT IS SO ORDERED.

By:   
Judge, U.S. District Court

Dated: November 30, 2022